

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

In re: **RICHARD A. GOINS,**  
**5600 Baume Circle**  
**Richmond, VA 23237**  
**SSN: xxx-xx-3875**

Case No. **18-30081-KLP**  
**Chapter 7**

**Debtor.**

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** Roy M. Terry, Jr., Chapter 7 Trustee, has filed the *Trustee's Motion to Extend Time to Object to the Granting of the Debtor's Discharge and to Extend Time to File a Complaint Objecting to Discharge and Notice Thereof* (the "Motion"). A copy of the Motion is attached hereto.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to grant the relief sought in the Motion, or if you want the court to consider your views on the motion, then within fourteen (14) days from the date of service of this Notice, you or your attorney must:

1. File with the Court, at the applicable address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1(H). If you mail your response to the court for filing, you must mail it early enough so that the court will **receive** it on or before the date stated above.

Clerk's Office  
United States Bankruptcy Court  
701 East Broad Street, Suite 4000  
Richmond, Virginia 23219

You must also mail a copy to:

Robert Van Arsdale, Esquire  
Office of the U.S. Trustee  
701 East Broad Street, Suite 4304  
Richmond, Virginia 23219

2. If you file such a timely written response, you must also attend a hearing that will be scheduled at a later date. You will receive separate notice of any such hearing.

Roy M. Terry, Jr., VSB No. 17764  
SANDS ANDERSON PC  
P.O. Box 2188  
Richmond, Virginia 23218-2188  
Telephone: 804.648.1636  
*Chapter 7 Trustee*

**Under Local Bankruptcy Rule 9013-1, unless a written response to the Motion and supporting memorandum are filed with the Clerk of Court and served on the moving party within fourteen (14) days of the service of this notice objecting to the relief requested, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing.**

Respectfully submitted, this 16<sup>th</sup> day of April, 2018.

/s/ Roy M. Terry, Jr.

Roy M. Terry, Jr., VSB No. 17764  
SANDS ANDERSON PC  
P.O. Box 2188  
Richmond, Virginia 23218-1998  
Telephone: 804.648.1636  
*Chapter 7 Trustee*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 16<sup>th</sup> day of April 2018, a true and correct copy of the foregoing Motion was sent electronically through the Court's electronic filing system and/or first-class mail, postage prepaid, to:

Robert B. Van Arsdale, Esquire  
Assistant U.S. Trustee  
Office of the U.S. Trustee  
701 East Broad Street, Suite 4304  
Richmond, Virginia 23219

Richard A. Goins  
5600 Baume Circle  
Richmond, VA 23237-3809

Mary-Scott Gates Hennigan, Esquire  
Gates Law Office  
P.O. Box 187  
Chesterfield, VA 23832  
*Counsel for the Debtor*

/s/ Roy M. Terry, Jr.

ND4844-4471-3314